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1 Attorneys for Debtor

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8 **UNITED STATES BANKRUPTCY COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**
10 **FRESNO DIVISION**

11 **In re:**) Case No. 10-64039
12 **JAMES GIBBS,**)
13) Chapter 7
14 Debtor)
15) DCN: GCL-1
16)
17) **NOTICE OF MOTION FOR AN ORDER**
18) **EXTENDING THE DEADLINE TO FILE**
19) **OBJECTION TO DISCHARGE UNTIL**
20) **JUNE 30, 2011**
21)
22) **[FRBP 4007(c)]**
23)
24) Date: April 22, 2011
25) Time: 9:00 a.m.
26) Place: Courtroom 11
27) 2500 Tulare Street
28) Fresno, CA 93721

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TO THE HONORABLE WHITNEY RIMEL, UNITED STATES BANKRUPTCY
JUDGE; SHERYL ANN STRAIN, CHAPTER 7 TRUSTEE; AND TO ALL OTHER
INTERESTED PARTIES:

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PLEASE TAKE NOTICE that a hearing on the Motion for an Order Extending the
Deadline to file Objection to Discharge until June 30, 2011, will be heard in Courtroom 11,
before the Honorable Whitney Rimel in the United States Bankruptcy Court, located at 2500
Tulare Street, Fresno, CA 93721 on April 22, 2011 at 9:00 a.m.

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NOTICE OF MOTION FOR AN ORDER EXTENDING THE DEADLINE TO FILE
OBJECTION TO DISCHARGE UNTIL JUNE 30, 2011

1 This Motion is based on the Motion for an Order Extending the Deadline to file
2 Objection to Discharge until June 30, 2011, the Declaration of James Gibbs, filed concurrently
3 herewith and on such further evidence and oral arguments that may be presented at the hearing in
4 this matter.

5 **PLEASE TAKE FURTHER NOTICE** that the Notice and Motion are being made
6 pursuant to Local Bankruptcy Rule 9014-1 and Federal Rules of Bankruptcy Procedure 4007(c).
7 Opposition, if any, shall be filed not later than **14 days before the date set for the hearing** and
8 the failure to timely file an opposition to the motion may be deemed by the Court to be consent
9 to the granting of the Motion.

10 Respectfully submitted.

11 Dated: March 8, 2011

GLOBAL CAPITAL LAW

14 /s/ Gary Harre _____
15 Gary Harre, Esq.
16 Diane Beall, Esq.
17 Attorneys for Debtor JAMES GIBBS